

**COLORADO DEPARTMENT OF PUBLIC HEALTH AND
ENVIRONMENT
(CDPHE)**

WATER QUALITY CONTROL DIVISION

**CLEAN WATER PROGRAM
FACILITY INSPECTION PLAN
STATE INSPECTION YEAR 2017 (IY17)
*October 1, 2016 - September 30, 2017***

1.0 GENERAL INFORMATION

The Federal and State Inspection Year 2017 (IY17) starts on October 1, 2016 and ends on September 30, 2017. This inspection plan addresses planned field-based compliance assurance activities for the NPDES program and state-only permitted/authorized facilities. The permits/authorizations against which inspections will be conducted include individual permits, general permit-covered facilities and notices of authorization.

The Animal Feeding Operation, Concentrated Animal Feeding Operation and Housed Commercial Swine Feeding Operations Programs reside in CDPHE's Environmental Agriculture Program, and a separate inspection plan has been developed by CDPHE and submitted to EPA for these programs.

2.0 OVERALL APPROACH

The Water Quality Control Division developed this inspection plan with a focus on achieving water quality outcomes via compliance monitoring inspections. This strategy was used to determine how inspection resources would be allocated, how inspections would be targeted, and which facilities would be inspected. This approach is consistent with direction provided in EPA's October 2009 *Clean Water Action Plan (CWAP)* and June 2010 *Interim Guidance to Strengthen NPDES Performance (Interim Guidance)*, and with the division's strategic planning documents. The approach is also consistent with the *Colorado Environmental Performance Partnership Agreement FY2016-2017* and *Region 8 Guidance*.

In the *CWAP*, EPA indicates that "...we must revamp federal and state enforcement to tackle sources posing the biggest threat to water quality..." and acknowledges that "The program's existing focus on the biggest facilities and the associated policies for designating and addressing violations do not consider the full range of the NPDES regulated universe and may not always allow for responses to be tailored to the type of violation and its impact." In the *Interim Guidance*, EPA calls on EPA Regions and States "to identify water quality priorities at the national, regional, and state level and to use those priorities to guide the investment of our limited resources toward addressing the most significant water quality problems and the most serious violations." It also indicated that targeting should take advantage of flexibility that is available in EPA's 2014 *CWA NPDES Compliance Monitoring Strategy for the Core Program and Wet Weather Sources* to ensure the most significant facilities are getting inspected and monitored.

One of the division's strategic goals is to "Protect all designated uses by attaining water quality standards through improved implementation of the federal Clean Water Act and Colorado Water Quality Control Act and their associated regulations" and states that the division will "deploy resources to achieve the greatest benefit for public health and the environment." The division continues to face significant resource and funding constraints, so inspection resources are being directed toward achieving environmental outcomes.

Starting in IY11 the division shifted inspection resources to improve oversight of process water facilities that had minimal field based compliance activities. As a result in this shift in philosophy, a smaller universe of major facilities will be inspected as well as the traditionally-inspected domestic and treatment-oriented industrial facilities.

For IY17 through IY19 EPA is rolling out a new "industrial discharger" National Enforcement Initiative that covers four sectors: chemical manufacturing, metal manufacturing, mining, and food

processing. This initiative will identify a portion of the facilities on a small list of violators (based on DMRs in ICIS) across these four sectors for inspection. The WQCD and EPA may or may not elect to conduct joint inspections at these National Enforcement Initiative identified facilities.

2.1 Inspection Resources

Compliance inspections within the division are performed by staff in the Field Services and the Clean Water Compliance Unit. The specific resource allocations are as follows:

2.1.1 Field Services Section - Process Water Majors and Minors

- Domestic and industrial permitted facilities for those sectors assigned to the Field Services Section
- Industrial and commercial process water discharges with the exception of the construction sector, groundwater dewatering, and remediation. Reuse facilities - inspection focused on the treatment facility only
- Metal mining facilities
- Stormwater inspections at facilities where a process water inspection is already being performed.
- Biosolids (generators) inspections at all domestic facilities where a process water inspection is already being performed. This does not include inspection of land application sites.

2.1.2 Clean Water Compliance Unit

- Construction sector facilities (include construction stormwater, hydrostatic testing, groundwater dewatering, and remediation at both active construction projects and long-term remediation sites)
- Stormwater for industrial activities (non-mining)
- Sand and gravel (and other non-metallic materials) mining facilities
- Coal mining facilities
- Groundwater Remediation
- Pretreatment (State Required Program Audits and CIU, SIU inspections)
- Biosolids (DWWTW Land Application Sites)
- Reclaimed Wastewater (Users and treater program implementation)
- Pesticide Discharges
- MS4

The associated targeting rationale for all of the inspection types are discussed in the respective following sections. The definitions of "major" and "minor" facilities have been previously agreed upon with EPA. The division's Inspection planning for the current inspection year is based upon the inventory of effective or administratively continued permits as of July 2016.

Facilities that are not included on the planned inspection lists may be inspected throughout the year in response to complaints, compliance issues, public health or environmental threats, or when opportunities arise. For example, if the inspector is in the vicinity conducting another inspection, they may inspect a nearby facility, even though it is not on the inspection list. Depending on the scope and number of these unplanned inspections, it may be necessary to postpone planned inspections.

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3.0 PROCESS WATER MAJOR and MINOR FACILITY INSPECTIONS

Planned inspections at Process Water facilities covered under this section include the following types of facilities:

- Sewage facilities (Inspection numbers included under “Major” and “Minors” - “Sewerage” in Attachment 1).
- Industrial (non-mining) majors (Inspection numbers included under “Majors” - “Commerce and Industry” in Attachment 1).
- Water Treatment Plants (Inspection numbers included under “Major” and “Minors” - “Drinking Water Backwash” in Attachment 1).
- Metal Mining Facilities (Inspection numbers included under “Major” and “Minors” - “Mining/Extractive Resource” in Attachment 1).

Process waters facilities not listed above are covered under sections below.

3.1 Planning Considerations

The Integrated Compliance Information System (ICIS) database was used in conjunction with the division’s internal permit tracking records to generate initial inventories for both major and minor process water facilities in the State. Selection of process water facilities for the current inspection year included evaluation of the inventories in accordance with the following considerations:

3.1.1 Date of last inspection

The date of the last inspection is utilized to address negotiated frequency goals.

3.1.2 Identified Sanitary Sewer Overflow (SSO) issues

The division reviewed the historical SSO information to address the division’s implementation of the SSO Response Strategy. For the current Inspection Year collection-system-only systems were also considered candidates for inspections. These inspections will be in addition to facilities that are already targeted for a CEI. For the upcoming inspection year a minimum of one collection-system is currently planned, however additional ones may be added based on reported SSO events.

3.1.3. Results of the Inspection Targeting Model (ITM) In accordance with EPA’s 2014 *Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy for the Core Program and Wet Weather Sources*, if states utilize the Inspection Targeting Model (ITM) for inspection planning, major facilities must be inspected every two years unless the specified compliance criteria are met by the facility. Where the compliance criteria are met, the facility inspection frequency can be reduced to once every three years.

The division is continuing to use the ITM and ran the model again for IY17. The IY17 majors were selected for inspection based upon the three-year frequency, SSO issues and other recurring or unresolved compliance issues. A total of 43 major discharge facilities are included in the current inspection year plan. The number of minor discharge facilities identified with the ITM is 98.

3.1.4 Other Recurring, Serious or Unresolved Compliance Issues

On a case-by-case basis, the division will plan to inspect specific facilities with recurring, serious or unresolved compliance issues.

3.1.5 Reuse Treatment Inspections

In IY10, the division started conducting CEI-type inspections at Reuse Treatment facilities. This will continue in IY17 by the Field Services Section. Reuse treatment inspections will be conducted at sewage systems that have reuse treatment notices of authorization. Where the treatment also has a normal discharge permit, the associated permit compliance inspection(s) will also be conducted (i.e. major, domestic minor).

3.1.6 Biosolids (Generator) Inspections

The division is planning to conduct biosolids inspections at all domestic facilities that are scheduled for compliance inspections.

3.1.7 Stormwater Inspections at Process Water Facilities

Stormwater inspections will be conducted at sewage and industrial facilities that have stormwater permits or are subject to application requirements and do not have a permit (no discharge or non-filer).

Currently, the planned inspections, at both major and minor process water facilities, are based on current staffing levels of the Field Services Section. Due to budget short falls, midway through IY16 and continuing into IY17 the Field Services Section has had to maintain a one FTE staff vacancy within the Clean Water Act Program in order realize budget savings. The Division is currently engaged in a multi-year process to address funding shortfalls within all Clean Water Act Programs. Though attempts to address funding shortfalls are ongoing, it is anticipated that staff vacancies will not be filled in a timely fashion. The current planned inspections account for this ongoing FTE vacancy. If the position can be filled in IY17 it would be late in the inspection year, and given necessary training the Field Service Section anticipates that the vacancy will effectively impact the entire inspection year.

4.0 BIOSOLIDS LAND APPLICATION

This section addresses facilities with land application of biosolids covered by Colorado's Regulation 5 CCR 1002-64. Inspection numbers for this sub-section are included under "Non-CDPS" - "Division Authorized Biosolids Land Application," in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

The division's requirements for, and oversight of, biosolids land application is limited to land application of materials from Domestic Waste Water Treatment Facilities regulated under 5 CCR 1002-22.

The division uses contracts with local county departments to conduct a significant portion of biosolids inspections at land application sites throughout the state, as has been the practice for many years. Using this approach the division has contracted to have land application sites inspected in this inspection year by the following local health departments (LHD): Tri-County (Arapahoe, Adams, and Douglas), Weld, and Northeast Colorado (Logan, Morgan, Phillips, Sedgwick, Washington and Yuma). Several factors may limit the actual number of inspections conducted, including the number of active sites for inspections within a specific county and availability of LHD staff. Additional inspections will be conducted by division staff in order to provide a state-wide presence, consistency, and in response to complaints. Because biosolids is not an EPA delegated program, the inspection plan identifies the division's oversight goal, but does not include a

commitment to EPA on oversight. The actual inspections conducted may be decreased by as much as 25% dependent on vacancies and health department inspection numbers.

EPA's compliance oversight goal for land application sites is that each biosolids use operation should receive at least one sludge/biosolids inspection every five years. This measure does not translate to a frequency of oversight for individual land application sites. The division's current process is based on inspections of individual application sites and is not currently measuring frequency of inspections for each operation in the state. The division will evaluate modifications to tracking and processes during this inspection year to track inspections to this goal.

Since Colorado is not a delegated state for biosolids, inspection will be conducted and documented in accordance with division processes and not align with EPA compliance inspection guidance.

5.0 Mining Facilities (except Metal Mining)

This section addresses facilities with process water and stormwater discharges associated mining, or extractive, process with the exception of metal mining facilities which are addressed in Part 3.0. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

5.1 Sand and Gravel Mining Facilities

The division will conduct targeted and complaint-based inspections for Sand and Gravel (and other nonmetallic materials) mining facilities in accordance with this part. Inspection numbers for this sub-section are included under "Sand and Gravel Mining" in Attachment 1.

During previous inspection years, inspections for facilities with process water permits were conducted in accordance with the targeting and processes discussed in Part 3.0. Oversight of these facilities will be consistent across the sector regardless if the discharge includes stormwater and/or process water.

The division's current oversight goal for this sub-sector is to conduct a total number of CEIs equal to 2% of permitted facilities. The actual committed number of inspections for this sub-sector accounts for FTE staff vacancy for this inspection year within the Clean Water Compliance Unit. It is projected vacancy will result in a 50% decrease in available resources for oversight for this sub-sector based on one staff vacancy within the unit that is not planned to be filled. Therefore, the commitment is to conduct CEIs equal to 1% of the number permitted facilities on August 1, 2016.

Inspections of non-permitted facilities will be included in this measure. The division may have additional resources to conduct more targeted CEIs than what is projected in this plan if current vacancies are not sustained and new vacancies do not occur, and as such additional resources may become available. The division may also conduct compliance monitoring activities to locate facilities that have failed to obtain permit coverage. Inspections of unpermitted facilities will count toward the annual goals.

The following inspection targeting strategies will be implemented this inspection year:

- Complaints will be given the highest priority for inspection oversight.
- Targeted Geographical Area: The division will not target specific geographical areas, instead the division will seek to obtain statewide coverage

- Facilities for which reporting violations have been identified, and based on the potential for additional violations that would represent environmental concerns.

Documentation for inspections addressed in this subsection will vary from guidance included in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Specifically, the following information may not be documented in inspection reports which do not also include an inspection of a discharge covered under Part 3.0 (Process Water Major and Minor Facility Inspections):

- Effective and expiration dates for permit coverage.
- The inspection report may not document information already contained within the permit application or permit certification. E.g., name and contact information for permit responsible officials.
- Division reviewer information.
- Information for “Regulatory Office Use Only.”
- Documentation of items evaluated for which a compliance finding was not generated.

Compliance Assistance/Education

The division will target specific facilities for compliance assurance and assistance through the inspection process and direct contact. The division will also continue to seek opportunities to partner with industry groups and other stakeholders to develop additional guidance materials and provide training. It is currently planned that the COR030000 general permit for construction stormwater will be renewed this inspection year, and will likely drive the need for revising current guidance and conducting additional training.

5.2 Coal Mining Facilities

The division will conduct targeted and complaint inspections for coal mining facilities in accordance with this part. Inspection numbers for this sub-section are included under “Coal Mining” in Attachment 1.

The division oversight goal for this sub-sector is to conduct one CEI per year, which equates to 3% of the number permitted facilities on August 1, 2016. The actual committed number of inspections for this sub-sector accounts for FTE staff vacancy for this inspection year within the Clean Water Compliance Unit. It is projected that this vacancy will result in no inspections being conducted for the sub-sector. However, the division did exceed the goal of one inspection for the IY 2016 and conducted 2 inspections, so therefore the division will be meeting its 3% oversight goal when taken over a 2 year period.

Although it is not anticipated that unpermitted facilities will be identified for this subsector, any inspections of non-permitted facilities will be included in this measure. The division may also conduct compliance monitoring activities to locate facilities that have failed to obtain permit coverage. Inspections of unpermitted facilities will count toward the annual goals.

Complaints will be given the highest priority for response and inspection. Targeted inspections will be identified based on factors that include how recent the permit was renewed or will be renewed next, the need for information to support permitting, compliance concerns, and potential for environmental impact.

Documentation for inspections addressed in this subsection will vary from guidance included in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Specifically, the following information may not be documented in inspection reports which do not also include an inspection of a discharge covered under Part 3.0 (Process Water Major and Minor Facility Inspections):

- Effective and expiration dates for permit coverage.
- The inspection report may not document information already contained within the permit application or permit certification. E.g., name and contact information for permit responsible officials.
- Division reviewer information.
- Information for “Regulatory Office Use Only.”
- Documentation of items evaluated for which a compliance finding was not generated.

Compliance Assistance/Education

The division will target specific facilities for compliance assurance and assistance through the inspection process and direct contact. The division will also continue to seek opportunities to partner with industry groups and other stakeholders to develop additional guidance materials and provide training.

6.0 STORMWATER - INDUSTRIAL FACILITIES NON-MINING

This section addresses facilities with stormwater discharges associated with “non-extractive industrial activities,” which includes facilities that are not construction or extractive (i.e. metal mining and sand and gravel general permits). Inspection numbers for this sub-section are included under “Minors” - “Stormwater Industrial (Non-Construction) - Non-Mining,” in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit, with the exception of those facilities addressed in Part 6.1.

6.1 Facilities with Process Water Discharge Permits

The division will continue to conduct stormwater industrial inspections at facilities where process water permit inspections are planned, as discussed in Part 3.0. These inspections are in addition to the goals and discussed in Part 6.2, below.

6.2 Facilities without Process Water Discharge Permits

The division will also conduct targeted and complaint inspections for facilities with stormwater discharges that do not also have process water permits addressed in Part 3.0, in accordance with this part.

The division current oversight goal for this sub-sector is to conduct a total number of CEIs equal to 2% of permitted facilities, or to conduct inspections including a combination of CEIs and non-CEIs with an equivalent total resource commitment. The actual committed number of inspections for this sub-sector accounts for FTE staff vacancy for this inspection year within the Clean Water Compliance Unit. It is projected that this vacancy will result in a 50% decrease in available resources for oversight for this sub-sector. Therefore, the commitment is to conduct CEIs equal to 1% of the number of permitted facilities on August 1, 2016, or to conduct inspections including a combination of CEIs and non-CEIs with an equivalent total resource commitment. The division may have additional resources to conduct more targeted CEIs than what is projected in this plan if

vacancies do not occur and as such additional resources may become available. Inspections of non-permitted facilities will be included in this measure.

For the inspection year, the division will use a combination of CEI and non-CEI Tier 1 inspection to increase the total number of facilities and entities that obtain oversight. Tier 1 inspections are discussed below. For determining the total target, the division equates 2.5 non-CEI Tier 1 inspections as taking the equivalent resource needs as one CEI inspection. Therefore the total goal for the combined inspections is to conduct a number CEI and Tier 1 inspections in accordance with the following equation:

$$1\% \times \text{Number of Active Permits} = \text{Number of CEI Insp.} + \text{Number of Tier 1 insp.} \div 2.5$$

The specific targets identified for Tier 1 and CEI inspections may be revised from that provided in the appendix during the inspection year dependent on the need for complaint response, follow up inspections, and the sectors targeted for Tier 1 inspections, but will still be in accordance with this equation. The division may also conduct compliance monitoring activities to locate industrial facilities that have failed to obtain permit coverage or file a “no exposure certification.” Inspections of unpermitted industrial stormwater facilities, including those with “no exposure certification,” will count toward the annual goals.

The following inspection targeting strategies will be implemented this inspection year using a combination of Tier 1 and/or CEIs:

- Complaints will be given the highest priority for inspection oversight.
- At least 15% of the total inspection projected for this sector towards facilities where receiving waters are impaired or have a TMDL in place for which the runoff from the facilities have the reasonable potential to contribute to an exceedance of the standard associated with the impairment or TMDL.
- Targeted Geographical Area: The division will not target specific geographical areas, instead the division will seek to obtain statewide coverage
- Facilities for which reporting violations have been identified based on the potential for additional violations that would represent environmental concerns.

Tier 1 inspections are Reconnaissance Inspection without Sampling (ROS) conducted at permitted facilities, and do not include a complete assessment of site documents and will not be documented consistent with CEIs. Tier 1 inspections have two primary goals: 1) To assist the permittee in better understanding of permit conditions and compliance expectations; 2) To conduct and document a general site assessment and an evaluation of the permittee’s responsiveness. This information will be used to prioritize future CEI inspections. Tier 1 inspections include a cursory review of site documentation to assess the overall presence and absence of required items, an assessment of pollutant sources and control measures, and on-site compliance assistance. Findings are documented in a streamlined inspection report that is provided to the permittee. The report will include basic site identification and inspection information, and a brief identification of the findings observed. Tier 1 inspection reports will not contain all of the elements included in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Tier 1 inspections will most often be targeted to specific sectors and may include an assessment of all, or a portion of, the permitted facilities in the sector. Sectors will be targeted based on observations that there is potentially increased noncompliance within that sector as compared to the permitted

universe, as identified from reporting and field observations. Tier 1 inspections may also be targeted at facilities that have not submitted permit required reports.

CEI documentation for this sector will also vary from that including in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Specifically, the following information may not be documented in CEI reports that do not also include an inspection of a discharge as defined in Part 3.0:

- Effective and expiration dates for permit coverage.
- The inspection report may not document information already contained within the permit application or permit certification. E.g., name and contact information for permit responsible officials.
- Division reviewer information.
- Information for “Regulatory Office Use Only.”
- Documentation of items evaluated for which a compliance finding was not generated.

Compliance Assistance/Education

The division will target specific facilities for compliance assurance and assistance through the inspection process and direct contact. The division will also continue to seek opportunities to partner with industry groups and other stakeholders to develop additional guidance materials and provide training.

7.0 PRETREATMENT SIGNIFICANT INDUSTRIAL USERS (SIUs)

This section addresses industrial pretreatment facilities covered by Colorado’s Regulation 5 CCR 1002-63 and pretreatment programs implemented by POTWs that are not covered by federal pretreatment requirements. Inspection numbers for this sub-section are included under “Pretreatment,” in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

The division issues Notice of Discharge Requirements (NDRs) to Significant Industrial Users that discharge to POTWs without approved pretreatment programs.

EPA has responsibility for meeting compliance strategy goals for pretreatment inspections of NSIUs and SIUs covered by federal discharge limitations that are covered by NDRs currently issued by the division. EPA’s goal is that SIUs directly regulated by regional offices or states should be inspected annually, with sampling as appropriate, except where the SIU is designated with a reduction in monitoring and inspection frequency as designated in 403.12(e)(3). The division will be the lead on any requirements included in NDRs that are more stringent than EPA requirements.

For SIUs covered by a state NDR that are not subject to federal effluent limitations, the division will be the lead for compliance oversight. There are currently no SIUs meeting this criterion.

The division currently does not plan to target inspections for SIUs this inspection year, however may conduct CEI inspections if necessary to address compliance concerns or complaints. Because pretreatment is not an EPA delegated program, the inspection plan does not include a commitment to EPA on oversight.

The division may conduct additional inspections to determine if facilities without NDRs that discharge to POTWs without approved programs are subject to categorical standards, if they meet criteria to be designated as SIUs, and/or to determine appropriate NDR conditions. These are anticipated to be site visits and may not be CEIs.

Since Colorado is not a delegated state for pretreatment, inspections will be conducted and documented in accordance with division processes and not align with EPA compliance inspection guidance.

8.0 RECLAIMED WATER USE SITES

This section addresses facilities that treat or use reclaimed water covered by Colorado's Regulation 5 CCR 1002-84. Inspection numbers for this sub-section are included under "Non-CDPS" - "Reuse Treaters" and "Reuse Users," in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

The division issues Notices of Authorization (NOAs) to treaters and users of reclaimed water.

The division current oversight goal for this sub-sector is to conduct a total number of user site inspections equal to 5% of authorized user sites and 5% of authorized treaters, based on authorization on August 1, 2016. Because reuse is not an EPA delegated program, the inspection plan does not include a commitment to EPA on oversight. The actual inspections conducted may be decreased by as much as 100%, dependent on vacancies.

Complaints will be given the highest priority for inspection oversight. The division will not include additional factors in targeting inspections for the inspection year.

Since reclaimed water requirements are not associated with federal requirements or delegation, inspection will be conducted and documented in accordance with the state process and not align with EPA compliance inspection guidance.

9.0 PESTICIDES

This section addresses point source discharges of pesticides. Inspection numbers for this sub-section are included under "Minors" - "Pesticide Applicators," in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

The division will conduct inspections to provide assistance and to collect information to further facilitate development of the compliance framework. Targeted inspections will be assistance focused and will be ROSs and not CEIs. ROSs for this sector may not include a field visit due to the nature of the activity not being continuous or at a fixed location. These inspections will be of entities required by the permit to submit annual reports. The division may conduct a limited number of unplanned CEI inspections to respond to complaints or potential impact on beneficial uses.

The division current oversight goal for this sub-sector is to conduct a total number of ROSs or CEIs equal to 35% of permitted facilities that submit annual reports for 2015. The actual number of inspections committed to for this sub-sector accounts for potential FTE staff vacancy within the Clean Water Compliance Unit. It is projected vacancies have the potential to result in a 50%

decrease in available resources for oversight for this sub-sector. Therefore, the commitment is to conduct CEIs equal to 12.5% of the facilities that submitted annual reports for 2015.

Inspection documentation for pesticides will vary from that including in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Specifically, the following information may not be documented in inspection reports:

- Effective and expiration dates for permit coverage.
- The inspection report may not document information already contained within the annual report. E.g., name and contact information for permit responsible officials.
- Division reviewer information.
- Information for “Regulatory Office Use Only.”
- Documentation of items evaluated for which a compliance finding was not generated.

10.0 CONSTRUCTION

This section addresses stormwater and minor process water discharges from construction facilities. Inspection numbers for this sub-section are included under “Minors” - “Construction Sector,” in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

This sector is addressed by several types of inspection. The inspection numbers for the various types of inspections for this section are discussed below and included in Attachment 1, as follows:

- CEIs in Part 10.4 below, and under “Construction Sector” in Attachment 1.
- ROSs
 - Targeted Compliance and Tier 1 inspection ROSs in Part 10.4 below, and under “Construction Sector Tier 1 ROS” in Attachment 1.
 - Stormwater Administrator Oversight ROSs in Part 10.3 below, and under “Construction Sector Tier 1 ROS” in Attachment 1.
 - Training ROSs in Part 10.2 below, and under “Construction Sector Training ROS” in Attachment 1.
- Third-Party Inspections
 - Stormwater Administrator Third Party Inspections in Part 10.3 below, and under “Construction Stormwater Administrator Third-Party Inspections” in Attachment 1.

Oversight inspections for the construction sector include multiple discharge permit types including stormwater associated with construction, construction dewatering (including groundwater remediation at construction sites), and hydrostatic testing. The EPA goal for permits authorizing stormwater associated with construction activities is to inspect at least 10% of the permitted sites each year or to implement an alternative compliance monitoring strategy. **The division believes that upon reaching the long-term goal for targets inspections of 500 inspections per year, resulting in a minimum commitment of 400 inspections contingent on vacancies, that the whole of the division’s construction compliance assurance program will result in an alternative compliance monitoring strategy that meets the expectations of the EPA Compliance Management System.** The division intends to begin meeting this goal by mid-inspection year, April 1, 2017.

10.1 Construction - Next Generation Compliance

The division will implement an Alternative Compliance Strategy for the construction sector that reflects Next Generation Compliance approaches. The division's compliance strategy is intended to both allow for improved targeting of enforcement resources on chronic and recalcitrant violators while encouraging and facilitating proactive compliance. The strategy creates a compliance assurance model intended to provide a more responsive and predictable process than the strategy prior to IY16. The new strategy increases compliance assistance through increased inspection frequency, increases individual assistance, increases compliance assistance resources, increases communication and follow-up after inspections, and provides consideration for first-time violators with a focus on repeat offenders.

The compliance strategy for the inspection year focuses on the following Next Generation Compliance components:

- Design regulations and permits that are easier to implement, with a goal of improved compliance and environmental outcomes.
The primary initial focus of this approach will be to improve the tools for understanding of current permits. Specific components will included:
 - Provide assistance through training and online resources to improve understanding of the requirements and tools for achieving and maintaining compliance (10.2)
 - Utilize the Stormwater Administrator Programs to provide innovative compliance tools, increase compliance, and to promote best practices through highlighting companies that achieve excellence (10.3)
 - One-on-one assistance provided during and following CEIs and some ROSs focused on accurate and complete compliance measurement to operators (10.5)
 - Increased follow-up in the field to identify and correct inadequate responses that may result from failure to understand the necessary measures to comply (10.5)
 - Gather information during the oversight process to support more effective permits during future renewals. (10.7)
- Develop and use innovative enforcement approaches (e.g., data analytics and targeting) to achieve more widespread compliance.
 - Utilizing third-party inspections through the Stormwater Administrator Programs to expand assistance and effective oversight (10.3)
 - Increase tracking of compliance measurements from CEIs and ROSs for use in targeting assistance, oversight, and enforcement (10.4)
 - Improved targeting of oversight based on compliance measures (10.4)
 - Conducting, tracking, and assessing oversight in a manner to allow for improved targeting of enforcement actions on chronic and recalcitrant violators (10.4)
 - Increased implementation of follow-up oversight to track and achieve increased return to compliance and improve assistance (10.5)
- Expand transparency by making information more accessible to the public (10.6)

10.2 Construction - General Assistance

The division will implement the following components for general assistance during the inspection year to improve awareness and comprehension of the requirements and tools for achieving and maintaining compliance. Note that specific guidance documents cited below may be renamed, separated, or combined during the year.

- The division will develop and maintain online resources:
 - Permitting compliance assistance will be provided in the Construction Fact Sheet, Oil and Gas Fact Sheet, and the Dewatering Fact Sheet. Guidance will provide information to decrease noncompliance associated with non-filers, applications, and modifications. Tools will be explained to allow for non-traditional permitting options to decrease the complexity of permitting and facilitate compliance. Options include field permitting for oil and gas, and solutions for sites with multiple owners and/or operators.
 - Implementation compliance assistance will be provided in the Stormwater Management Plan Guidance, Oil and Gas Fact Sheet, and the Dewatering Fact Sheet, and various subject specific technical guidance documents. Guidance will provide information on compliance expectations and on effective and efficient implementation of controls measures.
- The division will partner with other parties to provide training:
 - Participate in developing and maintaining training addressing permit requirements and compliance, including technical training of control measure implementation, through the Rocky Mountain Education Center at Red Rocks Community College. The division will not regularly participate in providing this training, but will provide presentations on occasion with a focus on supporting more complex materials or for audiences likely to have more complex questions.
 - Participate in developing, maintaining, and presenting training on evaluating compliance consistent with division and EPA expectations through the Rocky Mountain Education Center at Red Rocks Community College. The training includes a field component visiting one or more permitted construction sites. The field inspection will be an ROS led by division staff and findings will be provided orally to the permittee, no inspection report will be generated. The inspection will not be used to document findings of noncompliance. The inspection may trigger additional oversight if egregious conditions are observed at which time the division will utilize its Policy for Stormwater Management System Administrator Oversight Site as guidance in identifying the appropriate response, communication, and process in such cases.
 - Participate in developing, maintaining, and presenting training on permit requirements and compliance, including effecting compliance management systems, through the Colorado Stormwater Excellence Training provided through the Associated General Contractors of Colorado, an approved Stormwater Administrator (see Part 10.3 below).
 - Participate in training and coordination opportunities in partnership with local government, trade associations, and similar entities based on opportunities.

10.3 Construction - Stormwater Administrator Programs

The stormwater administrator program is a key component of the division's Next Generation Compliance Strategy. The program utilizes a public-private partnership targeting win-win solutions

to advance overall compliance goals while providing tools to participants to help them more effectively and efficiently achieve and maintain compliance. In addition, the program expands the availability of compliance tools and provides a model for compliance to the rest of the sector by facilitating and recognizing excellence in environmental compliance.

Colorado House Bill 11-1026 (C.R.S. 25-8, Part 8) was enacted in 2011 to create a process for application, approval, recognition, and oversight for Stormwater Management System Administrators (stormwater administrators). Administrator programs implemented in accordance with the bill set up procedures and tools to promote proactive compliance and environmental leadership within the construction industry. Stormwater administrators must implement a standardized compliance assistance and assurance program that contains processes, procedures, and associated training for participants that, when fully implemented by the program participants, would result in full compliance with the requirements of the CDPS stormwater construction permit. Although the program is not targeted at permitted non-stormwater discharges, the assistance and the management system implemented by the participants also provides tools to address compliance with permits for non-stormwater discharges. Program administrators are responsible for maintaining an effective program, and program approval can be revoked by the division.

Currently, there is one approved stormwater administrator, the Associated General Contractors of Colorado which administers the Colorado Stormwater Excellence Program. Participant numbers are identified in Attachment 1. The following key components are implemented by the Colorado Association of General Contractors as the program administrator for the current participants:

- **Management System:** The program utilizes a construction site compliance management system based on the concepts of an Environmental Management System (EMS). The system incorporates methods to ensure corporate commitment, accountability structures, measurable results, and continuous improvement.
- **Third Party Inspections:** The program ensures that a third-party inspection of each participant facility operating under a CDPS stormwater construction permit is completed on a monthly basis. The inspections provide oversight equivalent to a CEI, and also include assessment of the participants' implementation of the program's compliance management system. Standardized compliance performance measurement and scoring are provided to the division, but individual reports are not. A numeric goal for these inspections is included in attachment 1 based on active sites as of August 1, 2016. However the commitment is a narrative goal of one a month per active site based on the expected variability in the number of active sites during the inspection year. The robust division's process for auditing the program through site inspections will ensure that these inspections continue to accurately identify and require corrections for any permit violations.
- **Training Courses:** Two standard training courses are provided through the program, a basic course on the requirements and tools for compliance and an advanced course. The division is a participant in presenting the advanced course. The advanced course provides information on utilized the program compliance tools, management system, and standardized inspections. Additional training courses may also be conducted on an as-needed basis.

The division provides oversight to ensure the ongoing integrity and success of the administrator program. Oversight consists of review of program documentation and procedures as well as

inspections to evaluate the effectiveness of the administrator program and ensure the program is resulting in compliance with the construction stormwater permit. The program oversight inspection provides a compliance review equivalent to a CEI, but is considered a ROS by the division because of the lack of documentation and because the intent is overview of the program and not the specific facility. The ROS is led by division staff and findings are documented in a report form that is left with the permittee and sent to the program administrator. The inspection is not used to document findings of noncompliance to be retained by the division. However, the inspection may trigger additional oversight if egregious conditions are observed. Inspection and follow up are in accordance with the division policy CW-4 SMSA: Stormwater Management System Administrator Oversight Visits.

C.R.S 25-8-802(4) directs that the division may reduce oversight of facilities that “have a demonstrated record of reduced potential for occurrences of noncompliance and reduced risk of negative impacts on receiving waters.” The Colorado Stormwater Excellence Program (CSEP) program is intended to ensure that Qualified Level members meet this standard. The above ROS oversight process is implemented by the division to confirm that this condition is being met. The division compares oversight results from site visits of CSEP Qualifying Level members against other compliance evaluation inspections (CEIs) conducted. For the previous two inspection year, none of the Qualified Level sites evaluated during had site conditions observed during the visits that would have resulted in findings meeting the Division’s Enforcement Response Guide. It is the division’s determination that in accordance with C.R.S. 25-8-802(4), Qualified Level CSEP members are eligible for reduced level inspections and therefore will not be subject to targeted CEI inspections, discussed in Part 10.4, during the inspection year, unless conditions change or site or entity specific conditions warrant. However, these sites remain subject to the annual ROS program oversight inspections discussed above. The CSEP program also includes a Participant Level. Participant Level members are members that implement the tools and process of the program, but are not evaluated to determine qualification for reduced inspections. Participant Level members remain potential subject to CEI inspections discussed in Part 10.4 although will not be specifically targeted beyond the oversight rate discussed in that section. The division current annual goal for the Stormwater Administrator Program ROS inspections is to conduct one inspection for each active permitted Qualified Level construction site. Additional ROS inspections may be done of Participant Level construction sites.

10.4 Construction - Inspections - Targeting

Complaints will be given the highest priority for inspection oversight.

To facilitate a Next Generation Compliance approach to targeting compliance oversight, the division will identify and track the level of compliance identified during inspections, and relate that information with permit data. The division will then begin analyzing that information to identify the presence of trends and other information that will allow for more effective targeting of compliance assistance and oversight based on a variety of variables that may influence the level of compliance of a specific facility. Variables that may be evaluated include local jurisdiction, owner, and operator. Although the division may use the results of this evaluation for targeting during the inspection year on a limited basis, the intent is to begin building data sets and methods that will allow for more robust targeting beginning in inspection year 2018.

Direct oversight will be used for construction sites located both inside and outside of MS4 permitted areas. The division has currently suspended its process of using a combination of direct

oversight and MS4 oversight for sites located within MS4 permitted areas. This change is due to a lack of available resources to maintain oversight of MS4 permits to a level that would allow for a determination that the MS4 permittee was applying adequate oversight to meet water quality goals of construction sector permits. However, based on the results of the evaluation of data from division oversight discussed above, the division may prioritize or de-prioritize oversight in jurisdictions, including MS4 permittees, for which compliance trends are identified.

The division's Next Generation Compliance Strategy includes an objective to utilize the targeted compliance approach, increased data from compliance oversight, and an expanded use of follow-up compliance oversight to better identify and target serious violators for enforcement. The approach utilizes increased communication and follow-up after inspections, and provides consideration for first-time violators with a focus on repeat offenders for enforcement. Additional targeted CEIs and ROSs will be utilized to maintain a focus on the necessity for proactive compliance.

10.5 Construction - Inspections - Conducting

All inspections committed for the inspection year will be CEIs. However the division may conduct additional inspections that are above and beyond the commitments in the inspection plan as ROSs, and currently plans to expand the use of ROSs as part of its compliance strategy in the future.

The division long-term oversight goal for this sub-sector is to conduct 480 CEI inspections annually (or the equivalent resource commitment using a combination of ROS and CEI inspections) which may include up to 90 follow-up inspections of the same facility. The actual committed number of inspections for this sub-sector accounts for FTE staff vacancy and training for this inspection year within the Clean Water Compliance Unit. It is currently projected that 4 of the approximately 7.5 FTE available to conduct inspections for this sector will be hired within a few weeks of the start of the inspection year and require training and therefore reduce the capacity for inspections for this subsector by 27% (assuming each new inspector will produce about ½ of the normal annual targets, with full output being realized by April 1, 2017). Therefore, the adjusted inspection goal for this inspection year is 350. In addition, the division is projecting unplanned vacancies may have the potential to result in a further 20% decrease in available resources for oversight for this sub-sector. Therefore, the commitment is to conduct 280 CEIs. The division may have additional resources to conduct more CEIs or ROWs than what is projected in this plan if vacancies do not occur and as such additional resources may become available. Inspections of non-permitted facilities will be included in this measure.

For sites with multiple separately permitted discharges (e.g., stormwater and dewatering), each discharge for which separate permit coverage is obtained, or required under general permits, will be considered a separate inspection.

EPA has a different permitting approach than the division for most process water discharges that occur at construction sites, such as construction dewatering. EPA authorizes construction dewatering discharges as an allowable non-stormwater discharge in their national construction permit, and as such does not have a separate duty to apply for coverage, or numeric limits, sampling, or reporting requirements. Because of this, the goals for construction stormwater sites are the most applicable goal for the related process water discharges permitted separately by the division.

The division may count inspections conducted to meet target stormwater discharges at sites disturbing less than one acre, but for which an assessment of pollution potential is completed during an inspection.

The division issues field permit certifications for stormwater construction sites associated with oil and gas exploration and productions (i.e., well pads and associated infrastructure). These field permits cover multiple individual and distinct sites, each typically consisting of a single well pad location and the supporting infrastructure. For the purposes of identifying the number of inspections conducted, each site will be counted as a separate inspection even when they are under a single area wide permit certification.

ROSs may be conducted at permitted facilities for the purposes of compliance oversight and do not include a complete assessment of site documents and will not be documented consistent with CEIs. ROS inspections will be conducted to obtain a preliminary overview of a permittee's compliance. This information will then be used for targeting purposes, including potential targeting of the evaluated facility and/or to obtain information to be used in the targeting approach identified in Part 10.4, above. ROS inspections include an assessment of pollutant sources and control measures. ROSs may observe field conditions only, or may also include a cursory review of site documentation to assess the overall presence and absence of required items. ROS inspections may also be conducted as Tier 1 inspections, as discussed above for industrial stormwater, to 1) assist the permittee in better understanding permit conditions and compliance expectations. 2) To conduct and document a general site assessment and an evaluation of the permittee's responsiveness. Findings are documented in a streamlined inspection report that is provided to the permittee. The report will include basic site identification and inspection information, and a brief identification of the findings observed. ROS inspection reports will not contain all of the elements included in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3.

CEI documentation for the construction sector will vary from that including in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Specifically, the following information may not be documented in inspection reports:

- Effective and expiration dates for permit coverage.
- The inspection report may not document information already contained within the permit application or permit certification. E.g., name and contact information for permit responsible officials.
- Division reviewer information.
- Information for "Regulatory Office Use Only."
- Documentation of items evaluated for which a compliance finding was not generated.

10.6 Construction - Transparency

The following measures have been, or will be, implemented to make meaningful information on construction sector facility compliance and enforcement easier to access and use for the public, operators, and owners.

- Information on permitted facilities is posted to the internet.
- Information identifying inspections and Single Event Violations are posted to ICIS for public access through ECHO.

- Formal enforcement action documentation is posted to the internet

10.7 Construction -Gather Information to Support More Effective Permits

The division will continue to gather information and identify opportunities to incorporate Next Generation Compliance in discharge permits. Information will be gathered from compliance oversight and stakeholder communication to facilitate the development of more effective permits.

11.0 MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4S)

This section addresses discharges from MS4s. Inspection numbers for this sub-section are included under “Majors” and “Minors” - “MS4,” in Attachment 1. Compliance actions for facilities addressed in this section are conducted primarily by the Clean Water Compliance Unit.

EPA’s goal for oversight of MS4s is that an audit should be completed once every five to seven years, depending on the implementation of additional oversight activities.

Inspection/audit documentation for MS4 permits will vary from that including in the NPDES Compliance Inspection Manual and NPDES compliance inspection report form 3560-3. Specifically, the following information may not be documented in inspection reports:

- Effective and expiration dates for permit coverage.
- The inspection report may not document information already contained within the permit application or permit certification. E.g., name and contact information for permit responsible officials.
- Division reviewer information.
- Information for “Regulatory Office Use Only.”
- Documentation of items evaluated for which a compliance finding was not generated.

11.1 Standard MS4s

The division has determined that permitting new MS4s and renewing permits are high priorities. The majority of division resources for the MS4 sector are being directed to permitting. The division will only implement responsive oversight (e.g., complaints) and annual report review for the inspection year.

Estimates of the Ongoing, Stage 1, and Stage 2 oversight tools that are projected for this inspection year are as follows:

Complaints Referral (with tracking of MS4 follow up): 12
Annual Report Review: 60

The oversight tools discussed above will result in partial oversight of all 60 standard MS4s. Complaints will likely result in oversight of approximately 12 permittees. Refer to Attachment 3 for information on oversight activities previously conducted.

11.2 Non-Standard MS4s

Non-standard MS4 permit include MS4s that are not owned or operated by a city or county, and for which the permittee does not assume land use authority and therefore oversight of third parties for construction and post construction. Non-Standard MS4s are typically located at distinct facilities with small drainage areas (e.g., school campuses) and/or overlap with standard MS4s (e.g., a

special district). Oversight of non-standard MS4 permittees has been primarily based on ongoing reporting, including annual reports and required responses to division inquiries.

Estimates of the specific oversight tools that are projected for use in IY16 are as follows:

Annual Report Review: 55

11.3 MS4 Compliance Assistance/Education

The division will seek opportunities to partner with MS4 permittee's and the Colorado Stormwater Council to provide limited compliance assistance during the inspection year when available resources allow.

12.0 EPA INSPECTIONS AND OVERSIGHT

12.1 EPA Conducting Inspections at Colorado NPDES Facilities

Early in IY17, EPA and CDPHE will discuss whether or not EPA will conduct additional inspections in Colorado. EPA will contact CDPHE if it intends to conduct an inspection at a Colorado NPDES facility two weeks prior to conducting that inspection. This two-week contact period will hold true except in emergency situations or citizen complaints. In all cases, contact will be made as early as possible before the inspection will be performed.

CDPHE may arrange to attend any additional EPA inspections at the mutual convenience of EPA and CDPHE. In the event that CDPHE is interested in attending an inspection at a facility where EPA has already scheduled the inspection, EPA will not be expected to reschedule the inspection as it impacts not only EPA resources (personnel and time), but also facility resources. The basic purpose of CDPHE's attendance will be to stay informed about compliance-related activities at Colorado NPDES facilities and to gather more detailed information about EPA's inspection procedures. CDPHE inspectors will not interfere with the conduct of the inspection unless asked for an opinion or comment.

12.2 EPA Oversight Inspections

EPA may conduct oversight inspections with CDPHE personnel where CDPHE leads the inspection. EPA will review the State's inspection list and may arrange to attend a CDPHE inspection at the mutual convenience of CDPHE and EPA - with as much advance notice as possible. In the event that EPA is interested in conducting an oversight inspection at a facility where CDPHE has already scheduled the inspection, CDPHE will not be expected to reschedule the inspection as it impacts not only CDPHE resources (personnel and time), but also facility resources.

EPA will offer verbal comments immediately after the inspection. CDPHE will prepare the final inspection report and transmit it to EPA. EPA will review the report and send a written evaluation of the inspection to CDPHE within 30 days after receipt. The basic purpose of these EPA oversight inspections will be to gather more detailed information about the State's inspection procedures to facilitate a means for evaluation in accordance with EPA's NPDES Inspector, training that is needed and optimization of CDPHE's inspection process. EPA inspectors will not interfere with the conduct of the inspection unless asked for an opinion or comment.

13.0 Inspection Contact Information

13.1 CDPHE Contact Information

Process Water Major and Minor Inspections

Greg Naugle is the primary CDPHE contact for sectors listed in 2.1.1, above, and inspections listed in Attachment 1 Summaries by Functional Group - Inspections by Field Services Section Contact via e-mail at Greg.Naugle@state.co.us or via phone at (303) 692-3582.

Stormwater, Biosolids, Reuse, and Pretreatment Inspections

Nathan Moore is the primary CDPHE contact for sectors listed in 2.1.2, above, inspections listed in Attachment 1 Summaries by Functional Group - Inspections by Clean Water Compliance Unit. Contact via e-mail at nathan.moore@state.co.us or via phone at (303) 692-3555.

13.2 EPA Contact Information

Michael Boeglin will be the primary EPA contact for inspection notifications.

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Attachment 1.
Planned Facility Inspections for IY16 with Associated Sectors

Facilities	Universe (8/1/2016)			Inspections (CEI unless noted)	% Oversight (CEI unless noted)	EPA Goals (CEI)	Notes
	WQCD Totals	NPDES	Non- NPDES				
MAJORS							
Sewerage	92	90	2	34	38%	Variable	
Metal Mining	12	12	0	3	25%	Variable	
Commerce and Industry	15	15	0	6	40%	Variable	
MS4	5	5	0	0	0%	20%	Program audits
Water Treatment Plants	1	1	-	0	0%	Variable	
NON-CDPS							
Collection System Inspections	-	-	-				One identified based on objectives of SSO strategy. Additional may be added due to complaints or identified SEV.
Reuse Treaters	27	-	-	1	5%	none	Program audits. State only program, inspections are not an EPA commitment.
Reuse Users	480	-	-	24	5%	none	State only program, inspections are not an EPA commitment.
Division Authorized Biosolids Land Application	1011	-	-	60	5.9%	N/A	EPA oversight goal by operations, not by site. Universe provided is total authorizations and does not relate to the number of active sites. Non-delegated program, inspections are not an EPA commitment.
PRETREATMENT							
Division Authorized Pretreatment IUs	7	-	-	0	0%	100%	Non-delegated program, inspections are not an EPA commitment.
Division Approved POTWs	2	-	-	0	0%	20%	Program Audits. State only program, inspections are not an EPA commitment.
MINORS							
Sewerage	447	308	139	54	12%	variable	
MS4	111	111	0	0	0%	20%	Program audits
Commerce and Industry Individual Permits, not listed below	55	54	1	11	20%	20%	
Water Treatment Plants	89	88	1	29	33%	20%	
Metal Mining	100	-	-	4	4%	20%	Non-NPDES groundwater are not tracked.
Industrial Process Water General Permits	253	-	-	0	0%	20%	

Coal Mining	33	33	0	0	0%	10-20%	Two coal mines are majors, but are listed here and is covered by the same division compliance strategy.
Sand and Gravel Mining	627	627	0	6	1%	10-20%	
Stormwater Industrial (Non-Construction) - Non-Mining	944	944	0	CEI = 20 ROS = 5	CEI = 2% ROS = 0.5% Total = 2.5%	10%	Includes 13 stormwater inspections at process water facilities Universe does not include No Exposure Exclusions. No Exposure Exclusion Facilities (8/1/2016): 335
Construction Sector	4699	-	-	CEI = 280 ROS = 62 3 rd Party= 1140 inspections of 95 sites	CEI = 5.9% ROS = 1.3% 3 rd Party= Monthly for 2.0% of permitted sites Total = 8.0%	10%	Includes stormwater, groundwater dewatering (including remediation), and hydrostatic testing. Does not include R Factor Waivers. R Factors Waivers Sites (8/1/2016): 16 Stormwater Administrator Sites (8/1/2016) Qualified Level 59 Participant Level: 36 ROS and 3 rd Part inspection numbers are approximate, see "Inspections by Clean Water Compliance Unit" table below, some goals are narrative Total is reduced to account for the fact 3 rd party and ROS inspections provide oversight of the same sites.
Pesticides Applicators	unknown	-	-	5	unknown	none	Permittee numbers not know since certifications not issued. 42 entities submitted annual reports for 2015

Attachment 1 Summaries by Functional Group

Inspections by Field Services Section	Number of Planned Inspections
MAJORS	
Total Major Dischargers:	43
Number of Sewerage Majors:	34
Number of Mining/ Extractive Resource Majors:	3
Number of Industrial Majors:	6
MINORS	
Total Minor Dischargers:	98
Number of Sewerage Minors:	54
Number of Mining/ Extractive Resource Minors:	4
Industrial Process Water Minors (non-drinking water):	11
Drinking Water Backwash Minors:	29
Stormwater Minors:	13
NON-NPDES (CDPS permits)	
Groundwater Discharge:	1
Collection System Inspections:	1

Inspections by Clean Water Compliance Unit (All CEIs unless noted)		Inspections Goal	Inspections Commitment
MAJORS			
	MS4s:	0	0
NON-CDPS			
	Reuse Users	1	n/a
	Reuse Treaters	24	n/a
	Division Authorized Biosolids Land Application	60	n/a
PRETREATMENT			
	Division Authorized Pretreatment IUs	0	n/a
	Division Approved POTWs	0	n/a
MINORS			
	MS4	0	0
	Industrial Process Water General Permits Non-Construction:	0	0
	Stormwater Industrial CEI (Non-Construction, Non- Mining):	14	7
	Stormwater Industrial ROS (Non-Construction, Non- Mining):	10	5
	Sand and Gravel Mining:	13	6
	Coal Mining	1	0
		350	280
	Construction Sector CEI:		
Construction Sector ROS	Targeted Compliance and Tier 1 (Part 10.4):	0	0
		59	1/year per active Qualified Level site
	Stormwater Administrator Oversight (Part 10.3): Training (Part 10.2):	6	3
	Construction Third Party (Part 10.3):	1140	1/month per active site

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Attachment 2. Planned Inspections at Major Dischargers by Field Services Section

NPDES	Facility Identification	County	SIC Code	SIC Desc	Permit Sector
CO0039641	DELTA WWTF	Delta	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048151	RIFLE REGIONAL WW RECLAMATION FACILITY	Garfield	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0024082	DURANGO CITY OF	La Plata	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0040053	PERSIGO WWTF	Mesa	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048854	FRUITA WASTEWATER RECLAMATION FACILITY	Mesa	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0033791	CLIFTON SANITATION DISTRICT	Mesa	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0040037	CRAIG CITY OF	Moffat	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0027545	SOUTHWEST WWTF	Montezuma	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0039624	MONTROSE WWTP	Montrose	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041840	REGIONAL WWTF	San Miguel	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0000005	HAROLD D THOMPSON REGIONAL WW RECLAMATION FACILITY	El Paso	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0024392	SECURITY SANITATION DISTRICT WWTF	El Paso	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0042030	UPPER MONUMENT CRK REG WWTF	El Paso	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0039748	RAINBOW PARK WWTP	Fremont	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0023850	ROCKY FORD WWTF	Otero	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0000612	COMANCHE STATION	Pueblo	4911	ELECTRIC SERVICES	Commerce and industry
CO0040789	PUEBLO WEST METRO DIST WWTF	Pueblo	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0000621	EVRAZ ROCKY MOUNTAIN STEEL WWTF	Pueblo	3312	STEEL WORKS, BLAST FURNACES	Commerce and industry
CO0039900	CRIPPLE CREEK CITY OF	Teller	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0024562	CARLTON TUNNEL PORTAL SITE	Teller	1041	GOLD ORES	Commerce and industry
CO0043648	CRESSON PROJECT	Teller	1041	GOLD ORES	Commerce and industry
CO0024171	BIG DRY CREEK WWTF	Adams	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0026611	SAND CREEK WATER REUSE FACILTY	Arapahoe	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0001112	VALMONT STATION	Boulder	4911	ELECTRIC SERVICES	Commerce and industry
CO0042064	TREATMENT, STORAGE & DISPOSAL	Boulder	4953	REFUSE SYSTEMS	Commerce and industry
CO0043010	SUPERIOR METROPOLITAN DIST NO1	Boulder	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0023078	LOUISVILLE WWTF	Boulder	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0023124	LAFAYETTE WWTF	Boulder	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041700	ST VRAIN SANITATION DISTRICT	Boulder	4952	SEWERAGE SYSTEMS	Public and private utilities

CO0040339	SALIDA WWTF	Chaffee	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041467	URAD MINE	Clear Creek	1061	FERROALLOY ORES, EXCEPT VANADIUM	Commerce and industry
CO0040291	STONEGATE VILLAGE WWTF	Douglas	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0040142	UPPER FRASER VALLEY TP	Grand	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041530	GUNNISON CITY OF	Gunnison	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046761	BLACK HAWK/CENTRAL CITY SD WWTF	Jefferson	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0001163	MILLERCOORS GOLDEN FACILITY	Jefferson	2082	MALT BEVERAGES	Commerce and industry
CO0040142	UPPER FRASER VALLEY TP	Grand	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0026425	MULBERRY WWTP	Larimer	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0031844	UTSD WWTF	Larimer	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0020290	ESTES PARK SANITATION DISTRICT	Larimer	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0024147	75TH ST WWTP	Boulder	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0021440	FORT LUPTON WWTF	Weld	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0038334	LONDON WATER TUNNEL	Park	1622	BRIDGE, TUNNEL, AND HIGHWAY	Commerce and industry

Attachment 3. Planned Inspections at Minor Dischargers by Field Services Section

NPDES	Facility Identification	County	SIC	SIC Description	Permit Sector
CO0000008	1601 WEWATTA	Denver	6512	OPERATORS OF NONRESIDENTIAL BUILDINGS	Commerce and industry
CO0001139	ZUNI PLANT	Denver	4911	ELECTRIC SERVICES	Commerce and industry
CO0020010	LAKE ELDORA WSD WWTF	Boulder	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0021121	COLORADO CITY METRO DISTRICT	Pueblo	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0021156	JOHNSTOWN CENTRAL WWTF	Weld	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0022551	WAUCONDAH WWTP	Douglas	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0023094	ST. MARYS GLACIER WSD	Clear Creek	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0024201	VICTOR CITY OF	Teller	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0026468	LIGHTNER CREEK CAMPGROUND	La Plata	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0027961	GEORGETOWN WWTF	Clear Creek	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0030261	BROOK FOREST INN	Jefferson	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0031984	CEDAREDGE WWTF	Delta	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0037702	VISTA VERDE VILLAGE	Montezuma	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0040487	VALLEYWIDE SEWERAGE SYSTEM WWTP	Mesa	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0040509	DOLORES WWTF	Montezuma	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0040835	LOVELAND SKI AREA WWTF	Clear Creek	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041432	MORRISON TOWN OF	Jefferson	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041521	WILL-O-WISP METRO DISTRICT	Park	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0041785	WOLF CREEK SKI CORPORATION	Archuleta	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0042447	RIFLE STATION	Garfield	4939	COMBINATION UTILITIES	Commerce and industry

CO0043044	SAGEPORT WWTF	Douglas	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0043427	THERMAL ENERGY DISTRIBUTION	Denver	4961	STEAM AND AIR-CONDITIONING SUPPLY	Commerce and industry
CO0044270	FORT MORGAN BEEF PLANT	Morgan	2011	MEAT PACKING PLANTS	Commerce and industry
CO0044750	ROARING FORK WSD WWTF	Garfield	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0044903	HOTCHKISS TOWN OF	Delta	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0045411	CROOKED CREEK RANCH	Grand	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0045675	SAN LUIS GOLD	Costilla	1041	GOLD ORES	Commerce and industry
CO0045802	OAK MEADOWS WWTF	Garfield	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046124	SPRING VALLEY SD WWTF	Garfield	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046329	DENVER WORKS	Denver	2819	INDUSTRIAL INORGANIC CHEMICALS	Commerce and industry
CO0046370	REDSTONE WSD WWTF	Garfield	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046523	PENROSE WWTF	Fremont	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046540	FOURMILE CREEK SPRINGS	Teller	1041	GOLD ORES	Commerce and industry
CO0046566	DEVIL'S THUMB RANCH	Grand	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046795	CROWLEY COUNTY CORRECTIONAL WWTP	Crowley	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046914	ASPEN INSTITUTE WWTF	Saguache	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0046931	SILVER BELL TAILINGS	San Miguel	1099	MISCELLANEOUS METAL ORES	Commerce and industry
CO0046965	SPRING VALLEY RANCH WWTF	Elbert	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0047066	STERLING ETHANOL LLC	Logan	2869	INDUSTRIAL ORGANIC CHEMICALS	Commerce and industry
CO0047414	EATON WWTP	Weld	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0047431	PAONIA WWTF	Delta	4952	SEWERAGE SYSTEMS	Public and private utilities

CO0047635	WINDSOR ETHANOL PRODUCTION FACILITY	Weld	2869	INDUSTRIAL ORGANIC CHEMICALS	Commerce and industry
CO0048135	DEBEQUE TOWN OF	Mesa	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048143	MESA WSD	Mesa	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048241	EAGLE TOWN OF WWTP	Eagle	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048437	KREMMLING SANITATION DISTRICT WWTF	Grand	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048623	BARN SPRING WTF	Routt	4941	WATER SUPPLY	Public and private utilities
CO0048691	FOUNTAIN VALLEY POWER PLANT	Pueblo	4911	ELECTRIC SERVICES	Commerce and industry
CO0048830	GYP SUM TOWN OF WWTF	Eagle	4952	SEWERAGE SYSTEMS	Public and private utilities
CO0048853	WIGGINS WTF	Morgan	4941	WATER SUPPLY	Public and private utilities
COG588110	Hoehne School	Las Animas	4952	SEWERAGE SYSTEMS	Public and private utilities
COG589012	Manzanola WWTF	Otero	4952	SEWERAGE SYSTEMS	Public and private utilities
COG589036	FLAGER WWTF	Kit Carson	4952	SEWERAGE SYSTEMS	Public and private utilities
COG589102	Springfield WWTF	Baca	4952	SEWERAGE SYSTEMS	Public and private utilities
COG589126	Crowley WWTF	Crowley	4952	SEWERAGE SYSTEMS	Public and private utilities
COG589137	Olney Springs Wastewater Treatment Facility	Crowley	4952	SEWERAGE SYSTEMS	Public and private utilities
COG605013	MillerCoors LLC	Jefferson	2082	COMMERSE AND INDUSTRY	Commerce and industry
COG641008	SILVERTON TOWN OF	SAN JUAN	4941	WATER SUPPLY	Public and private utilities
COG641018	TRINIDAD CITY OF	LAS ANIMAS	4941	WATER SUPPLY	Public and private utilities
COG641025	PUEBLO BOARD OF WW	PUEBLO	4941	WATER SUPPLY	Public and private utilities
COG641031	EAGLE TOWN OF	EAGLE	4941	WATER SUPPLY	Public and private utilities
COG641031	EAGLE TOWN OF	EAGLE	4941	WATER SUPPLY	Public and private utilities

COG641035	TRINIDAD CITY OF	LAS ANIMAS	4941	WATER SUPPLY	Public and private utilities
COG641045	ROCKY FORD CITY OF	OTERO	4941	WATER SUPPLY	Public and private utilities
COG641052	GLENWOOD SPRINGS CITY OF	GARFIELD	4941	WATER SUPPLY	Public and private utilities
COG641065	MANCOS RURAL WATER COMPANY	MONTEZUMA	4941	WATER SUPPLY	Public and private utilities
COG641076	FORT COLLINS CITY OF	LARIMER	4941	WATER SUPPLY	Public and private utilities
COG641099	WALSENBURG CITY OF	HUERFANO	4941	WATER SUPPLY	Public and private utilities
COG641106	ARVADA CITY OF	JEFFERSON	4941	WATER SUPPLY	Public and private utilities
COG641107	RIFLE CITY OF	GARFIELD	4941	WATER SUPPLY	Public and private utilities
COG641108	RIFLE CITY OF	GARFIELD	4941	WATER SUPPLY	Public and private utilities
COG641111	MUSTANG WATER AUTHORITY	MONTROSE	4941	WATER SUPPLY	Public and private utilities
COG641125	RYE TOWN OF	PUEBLO	4941	WATER SUPPLY	Public and private utilities
COG641133	CARTER LAKE FILTER PLANT	LARIMER	4941	WATER SUPPLY	Public and private utilities
COG641134	PAONIA TOWN OF	DELTA	4941	WATER SUPPLY	Public and private utilities
COG641139	ALPINE WS	BOULDER	4941	WATER SUPPLY	Public and private utilities
COG641141	CAMP TIMBERLINE	LARIMER	4941	WATER SUPPLY	Public and private utilities
COG641146	CANON CITY CITY OF	FREMONT	4941	WATER SUPPLY	Public and private utilities
COG641147	CENTRAL CITY CITY OF	GILPIN	4941	WATER SUPPLY	Public and private utilities
COG641148	CENTRAL CITY CITY OF	GILPIN	4941	WATER SUPPLY	Public and private utilities
COG641154	HAMILTON CREEK METRO DIST	SUMMIT	4941	WATER SUPPLY	Public and private utilities
COG641168	PARKER WATER AND SANITATION DISTRICT	DOUGLAS	4941	WATER SUPPLY	Public and private utilities
COG641170	GUNNISON COUNTY WSD	GUNNISON	4941	WATER SUPPLY	Public and private utilities

COG641172	CRAGMONT WC	JEFFERSON	4941	WATER SUPPLY	Public and private utilities
COR040049	CRESSON PROJECT	Teller	1041	GOLD ORES	Commerce and industry
COR900095	Upper Thompson Sanitation District WWTF	Larimer	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900098	MONTROSE WWTP	Montrose	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900100	Durango City of	La Plata	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900110	LONGMONT WWTF	Boulder	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900345	Delta WWTF	Delta	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900377	MillerCoors Ford St	Jefferson	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900479	Molson Coors Property East of McIntyre	Jefferson	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900826	PERSIGO WWTF	Mesa	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900828	Lafayette Water Reclamation Plant	Boulder	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900834	Rock Creek WWTF	Boulder	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900837	Estes Park Sanitation District WWTF	Larimer	4952	SEWERAGE SYSTEMS	Commerce and industry
COR900902	EVRAZ ROCKY MOUNTAIN STEEL WWTF	Pueblo	3312	STEEL WORKS, BLAST FURNACES	Commerce and industry
COX630022	YOUNG LIFE TRAIL WEST	Chaffee	7032	SEWERAGE SYSTEMS	Public and private utilities

Attachment 3.

Historic Inspection Details

(Completed to Date not Planned for the Inspection Year)

Permittee	SW Major	SW Minor	Screening inspections	Additional Construction Sites Program Oversight (1)	Program Development Audit	Results Audit	Targeted Audit Questionnaire
Adams County		COR090041					IY12
Arapahoe County		COR080010					IY12
Arvada, City of		COR090013	IY12				IY12
Aurora, City of	COS000003		IY09	IY10, IY12	IY12	IY12	
Berthoud, Town of		COR090071		IY10	IY10	IY10	IY12
Boulder County		COR090020					IY12
Boulder, City of		COR090019	IY09				IY12
Brighton, City of		COR090089					IY12
Broomfield, City & County		COR090054	IY09				IY12
Canon City, City of		COR090079					IY12
Castle Pines North, City of		COR080022					IY12
Castle Rock, Town of		COR080012	IY10				IY12
Cherry Hills Village, City of		COR090066	IY10				IY12
Colorado Dept of Transportation	COS000005						
Colorado Springs, City of	COS000004		IY09	IY10			
Columbine Valley, Town of		COR090007					IY12
Commerce City, City of		COR090032					IY12
Denver City & County	COS000001		IY09				
Douglas County		COR080003	IY09				IY12
Durango, City of		COR090088		IY12, IY13			IY12
Edgewater, City of		COR090068		IY10	IY10	IY10	IY12
El Paso County		COR090011					IY12
Englewood, City of		COR090056					IY12
Erie, Town of		COR090021		IY10	IY10	IY10	IY12

Evans, City of		COR090058					IY12
Federal Heights, City of		COR090038					IY12
Fort Collins, City of		COR090050	IY10				IY12
Fountain, City of		COR090008	IY09				IY12
Glendale, City of		COR090003					IY12
Golden, City of		COR090004					IY12
Grand Junction, City of		COR090077	IY09				IY12
Greeley, City of		COR090033					IY12
Greenwood Village, City of		COR080004					IY12
Jefferson County		COR090024	IY12				IY12
Lafayette, City of		COR090030					IY12
Lakewood, City of	COS000002		IY09	IY10, IY12	IY12	IY12	
Larimer County		COR090052					IY12
Littleton, City of		COR090055	IY10				IY12
Lone Tree, City of		COR080016					IY12
Longmont, City of		COR090018					IY12
Louisville, City of		COR090017					IY12
Loveland, City of		COR090009	IY09				IY12
Manitou Springs, City of		COR090012					IY12
Mesa County		COR090031					IY12
Montrose, City of		COR090061	IY09				IY12
Monument, Town of		COR090039					IY12
Northglenn, City of		COR090010					IY12
Palisade, Town of		COR090005					IY12
Parker, Town of		COR080011					IY12
Pueblo County		COR090060					IY12
Pueblo West Metro District		COR090090					IY12
Pueblo, City of		COR090040	IY12		IY13*	IY13*	IY12
Sheridan, City of		COR090082					IY12
Southeast Metro Stormwater Authority SEMSWA		COR080021	IY09				IY12
Steamboat Springs, City of		COR090087					IY12

Superior, Town of		COR090022					IY12
Thornton, City of		COR090034					IY12
Weld County		COR090037					IY12
Westminster, City of		COR090051	IY10				IY12
Wheat Ridge, City of		COR090015	IY09	IY10	IY10	IY10	IY12

(1) - Does not include oversight using the complaint Tool oversight

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